

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

DR. IRAKLI GLONTI and DAVID DATESHIDZE,

Plaintiffs,

- against -

07 CV 10975 (CM)

LEHMAN BROTHERS, INC. and
RBC DAIN RAUSCHER, INC.

**NOTICE OF
MOTION**

Defendants.

-----X

PLEASE TAKE NOTICE, upon the Complaint in this action and the declaration of Geoffrey Valentino and the exhibits thereto, defendant Lehman Brothers, Inc. ("Lehman Brothers") will move this Court, on a date and at a time to be selected by the Court, for an order, (i) pursuant to the Federal Arbitration Act 9 U.S.C. § 1 *et seq.*, staying the claims in the Complaint against Lehman Brothers and compelling those claims to arbitration; and (ii) for such other and further relief as this Court may deem just and proper.

Dated: January 4, 2008
New York, New York

KREBSBACH & SNYDER, P.C.

BY: 

Theodore A. Krebsbach (TAK-2041)
Theodore R. Snyder (TRS-6376)

One Exchange Plaza
55 Broadway, Suite 1600
New York, NY 10006
(212) 825-9811

TO (via ECF):

Arnold I. Kalman, Esq.
Law Offices of Arnold I. Kalman
245 South Hutchinson Street
Philadelphia, PA 19107-5722

Attorneys for Plaintiffs
Dr. Irakli Glonti and David Dateshidze

Brian F. Amery, Esq.
Bressler, Amery & Ross, P.C.
325 Columbia Turnpike
Florham Park, New Jersey 07932

Attorneys for Defendant
RBC Dain Rauscher, Inc.